

DISTRICT COURT FOR THE DISTRICT OF
THE VIRGIN ISLANDS
DIVISION OF ST. THOMAS AND ST. JOHN

DAVID WHITAKER

Plaintiff,

V.

JAMES MARTIN

Defendant.

Civil Action No. 3:20-cv-00024

VERIFIED MOTION TO WITHDRAW

COMES NOW, Robert V. Goldsmith, III, Esq., as counsel for Plaintiff, David A. Whitaker, pursuant to Rule 5.2 of the Local Rules of Civil Procedure of the District Court of the Virgin Islands and moves for leave of the Court to withdraw as counsel for Plaintiff and as grounds for the same states as follows:

1. The undersigned has conferred with Plaintiff's additional legal counsel on this matter, Joseph Balliro, Esq. and the undersigned has agreed to withdraw in this matter with the filing of this Motion to Withdraw.
2. The undersigned moves this Honorable Court to stay proceedings for sixty (60) days or more to allow Plaintiff to secure new counsel and asserts that sixty (60) days or more will be required due to the constraints the world Covid-19 pandemic has placed on the ability of courts, attorneys, and parties to preside over, prosecute, and defend cases.

WHEREFORE, based on the foregoing, Counsel requests that the Court enter the Order filed contemporaneously herewith and attached hereto as Exhibit A, allowing counsel to withdraw from the representation of Mr. Whitaker in the above-captioned matter and staying proceedings in this matter for the time prescribed by the Court.

I swear/affirm under oath that I have read the foregoing Verified Motion and that the statements set forth therein are true and correct to the best of my knowledge.

Respectfully submitted:

Date: May 15, 2020

s/ Robert Goldsmith
Robert V. Goldsmith, III
PO Box 608
St. Thomas, VI 00804
256-974-1111
rgoldsmith@legal-cg.com

